

ID. Date of interview
date 11/02/20

ID. Time interview started
start 16:31:19

ID.end Completion date of interview
Date 11/02/20

ID.end Time interview ended
16:34:41

ID. Duration of interview
time 3.37

new case

ICO consultation on the draft right of access guidance

Q1 Does the draft guidance cover the relevant issues about the right of access?

☐ Yes

☐ No

☒ Unsure / don't know

If no or unsure/don't know, what other issues would you like to be covered in it?

We only wish to comment on the part of the draft guidance that relates to clarifications.

Q2 Does the draft guidance contain the right level of detail?

☐ Yes

☐ No

☒ Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

We only wish to comment on the part of the draft guidance that relates to clarifications.

Q3 Does the draft guidance contain enough examples?

☐ Yes

☐ No

☒ Unsure / don't know

If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

We only wish to comment on the part of the draft guidance that relates to clarifications.

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

We only wish to comment on the part of the draft guidance that relates to clarifications.

Q5 On a scale of 1-5 how useful is the draft guidance?

| | | | | |
|--------------------------|------------------------|----------------------------------|-----------------------|-------------------------|
| 1 - Not at all useful | 2 – Slightly useful | 3 – Moderately useful | 4 – Very useful | 5 – Extremely useful |
| <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q6 Why have you given this score?

We only wish to comment on the part of the draft guidance that relates to clarifications.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

| | | | | |
|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Strongly disagree | Disagree | Neither agree nor disagree | Agree | Strongly agree |
| <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

We welcome the opportunity to share our opinions against the proposed change to the timescales for compliance with data subject access requests. In our experience, the proposal to keep the clock running while awaiting clarification from an individual is neither reasonable nor practicable, for reasons such as listed below: - We work with a large number of individuals (students, visiting lecturers, etc.) who take a very long time to respond to requests for clarification, sometimes months - Responding to subject access requests sometimes involves searching, collecting and collating large volumes of information from several service areas and where clarification is received within a short period ahead of the deadline, it becomes practically impossible to meet our obligations under the law - The pressure of time is highly likely to increase human error in the management and security of personal data resulting in breaches - The pressure to meet obligatory requirements under these circumstances is bound to encourage processing without seeking clarification' which is likely to be problematic for both controllers and individuals

Q9 Are you answering as:

- ☐ An individual acting in a private capacity (eg someone providing their views as a member of the public)
- ☐ An individual acting in a professional capacity
- ☒ On behalf of an organisation
- ☐ Other

Please specify the name of your organisation:

City, University of London

What sector are you from:

Higher Education (Public Sector)

Q10 How did you find out about this survey?

- ☐ ICO Twitter account
- ☐ ICO Facebook account
- ☐ ICO LinkedIn account
- ☐ ICO website
- ☐ ICO newsletter
- ☐ ICO staff member
- ☐ Colleague
- ☐ Personal/work Twitter account
- ☐ Personal/work Facebook account
- ☐ Personal/work LinkedIn account
- ☒ Other

If other please specify:

PDP Training Newsletter; PLC Practical Law Newsletter